



Darcy L. Endo-Omoto  
Vice President  
Government & Community Affairs

March 23, 2010

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PUBLIC UTILITIES  
COMMISSION

The Honorable Chairman and Members of the  
Hawaii Public Utilities Commission  
465 South King Street, First Floor  
Kekuanaoa Building  
Honolulu, Hawaii 96813

Dear Commissioners:

Subject: Docket No. 2008-0273 – Feed-in Tariff (“FIT”) Proceeding  
Comments on Reliability Standards

Through the Commission’s October 29, 2009 Order Setting Schedule and March 11, 2010 Order Granting Extension Request, the Commission established March 23, 2010 for the parties to the above-subject proceeding to submit comments on the proposed reliability standards submitted for consideration. On February 26, 2010, Hawaiian Electric Company, Inc. (“Hawaiian Electric”), Hawaii Electric Light Company, Inc. (“HELCO”), and Maui Electric Company, Limited (“MECO”)(collectively the “Hawaiian Electric Companies”), in response to a Commission letter of February 19, 2010, submitted their proposal to convene a Reliability Standards Working Group (“Working Group”) to identify and implement the technical and policy solutions necessary to both facilitate the continued movement toward a clean energy future and ensure system reliability throughout the Hawaiian Electric Companies’ service territories. The February 26, 2010 proposal included a proposed conceptual framework which identified in part the Working Group’s role and objectives, participants and operating structure, governance and proposed technical studies and schedule.

The February 26, 2010 proposal and conceptual framework remain before the Commission for consideration. It is the position of the Hawaiian Electric Companies that any examination of the issues encompassed by a review of reliability standards should be undertaken in a comprehensive rather than piecemeal manner so that comprehensive solutions may be achieved. Accordingly, the Hawaiian Electric Companies respectfully reserve their rights to address the issue of reliability standards generally, and the proposals made by certain parties specifically, as a part of the Working Group (which is proposed to include all of the parties in Docket No. 2008-0273) or any alternative evaluation process approved by the Commission.

Sincerely,

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